

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

**Case No. HG 11-11052**

**DOROTHY S. JASTIFER,**

Chapter 7; Filed: 10/31/11

Debtor.

Honorable Jeffrey R. Hughes

/

**MOTION TO COMPEL TURNOVER**

NOW COMES Chapter 7 Trustee Jeff A. Moyer ("Trustee"), by and through his attorneys, The Bankruptcy Group, Inc., and states as his Motion to Compel Turnover to the Court the following:

1. Dorothy S. Jastifer ("Jastifer" or "Debtor") filed a voluntary Chapter 7 petition for relief on October 31, 2011.
2. Jeff A. Moyer ("Trustee" or "Movant") is the duly-appointed, qualified and acting Chapter 7 Trustee in this case.
3. The Trustee has requested turnover from Ms. Jastifer and her attorney on at least three separate occasions the following non-exempt property disclosed on her Schedule B but not claimed as exempt on her Amended Schedule C:

Chemical Bank Checking Account	\$ 348.98
Lake Michigan Credit Union Savings Account	\$ 5.06
Checking Bank Checking Account	\$ 18.21
1994 Ford Pickup	\$2,000.00
2003 Buick Rendezvous	<u>\$2,713.00</u>
	\$5,085.25

The Trustee requests turnover of the aggregate value of the funds and property in question which the Debtor has chose to retain by not turning it over to the estate for the benefit of her bankruptcy creditors.

4. The personal property involved is not of inconsequential value or without benefit to the estate.

5. Ms. Jastifer is required to turnover the funds in question to the Trustee under §542(a) and has not done so.

WHEREFORE, Trustee Jeff A. Moyer requests this Court to enter an Order granting the following relief:

A. Requiring the immediate turnover by Ms. Jastifer the amount of \$5,085.25 representing her non-exempt property; and

B. Grant such other or further relief as this Court deems just and proper.

Respectfully submitted,

**THE BANKRUPTCY GROUP, INC.**  
Attorneys for Trustee Jeff A. Moyer

Dated: January 16, 2014

By: Jeff A. Moyer (P44671)  
Jeff A. Moyer (P44671)  
Business Address:  
P.O. Box 337  
Grandville, MI 49468-0337  
(616) 532-4002